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17 Attorney for Plaintiff
18 CRISTINA MENDOZA

19 ** Defendants and their respective counsel listed after the caption.*

20 UNITED STATES DISTRICT COURT
21 NORTHERN DISTRICT OF CALIFORNIA

22 CRISTINA MENDOZA,

23 Plaintiff,

24 v.

25 CITY OF SAN JOSE, PACIFIC GAS &
26 ELECTRIC COMPANY, a California
27 registered domestic stock corporation,
28 HUDSON SKYPORT PLAZA, LLC, a
Delaware limited liability company,
HUDSON SKYPORT PLAZA LAND,
LLC, a Delaware limited liability company,
HUDSON PACIFIC PROPERTIES, INC.,
a Maryland corporation, SPIEKER
PROPERTIES LP, a California limited
partnership, EOP OPERTAING LIMITED
PARTNERSHIP, LP, a Delaware limited
partnership CA – SKYPORT I LIMITED
PARTNERSHIP, a Delaware limited
partnership; and DOES 1-100, Inclusive,
Defendants

Defendants.

CASE NO. 5:17-cv-03579 SVK
Civil Rights

**JOINT STIPULATION TO EXTEND
DEADLINES REGARDING AMENDED
PLEADINGS AND INITIAL MEDIATION
[AND ~~PROPOSED~~ ORDER]**

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9 **Attorneys for Defendants**

10 HUDSON SKYPORT PLAZA, LLC, a Delaware limited liability company, HUDSON
11 SKYPORT PLAZA LAND, LLC, a Delaware limited liability company, HUDSON PACIFIC
12 PROPERTIES, INC., a Maryland corporation

13 Plaintiff, CRISTINA MENDOZA (“Plaintiff”) and Defendants, HUDSON SKYPORT
14 PLAZA, LLC, a Delaware limited liability company, HUDSON SKYPORT PLAZA LAND,
15 LLC, a Delaware limited liability company, HUDSON PACIFIC PROPERTIES, INC., a
16 Maryland corporation (“HUDSON Defendants”), hereby jointly stipulate and request through
17 their attorneys of record the following:

18 WHEREAS, the Court in its initial scheduling order placed this case under the deadlines
19 and requirements of General Order 56 (GO 56) (Dkt. 4);

20 WHEREAS, the parties entered into a Consent Decree for Injunctive Relief only, which
21 was approved by this Court on June 8, 2018. (Dkts. 43, 44);

22 WHEREAS, Defendants City of San Jose, Spieker Properties LP, EOP Operating Limited
23 Partnership, and CA-Skyport I Limited Partnership were dismissed from the case. (Dkts. 47, 49);

24 WHEREAS, a stipulation to continue GO 56 deadlines was granted by this court on
25 August 10, 2018, which extended GO 56 deadlines and allowed the parties to conducted limited
26 discovery. (Dkt. 51);

27 WHEREAS, on February 1, 2019, PACIFIC GAS & ELECTRIC COMPANY (“PG&E”)
28 filed a Notice of Bankruptcy Filing and Imposition of Automatic Stay. (Dkt. 52);

WHEREAS, this Court continued the deadline to complete mediation under GO 56 to
September 5, 2019; (Dkt. 58);

WHEREAS, the parties filed status reports with this Court to apprise it of the status of the
case and each parties position. (Dkts. 59, 60);

1 WHEREAS, a case management conference was held on September 17, 2019 and the
2 Court: 1) set January 31, 2020 as the last day to amend pleadings; and 2) set an initial mediation
3 deadline for March 31, 2020. (Dkt. 70);

4 WHEREAS, Plaintiff has been informed by bankruptcy counsel that she must seek leave
5 of the bankruptcy court in PG&E'S bankruptcy cases in order to file and serve an amended
6 complaint.

7 WHEREAS, the parties have met and conferred regarding: (1) extending the time for
8 amending pleadings in this matter based on Plaintiff's intent to file a First Amended Complaint
9 (provided, however, that the stipulation does not obligate the HUDSON Defendants to stipulate to
10 the filing of a First Amended Complaint) and (2) extending the initial mediation deadline and
11 have reached the following agreement, the parties hereby STIPULATE as follows.

- 12 1. Due to the need of the Plaintiff to obtain leave of the Bankruptcy Court in order to
13 amend her complaint, the parties stipulate and respectfully request that the deadline to
14 move to amend the pleadings be extended from January 31, 2020 to March 2, 2020.
- 15 2. As a result of the deadline to amend pleading being continued to March 2, 2020 and
16 the fact that an additional defendant may need to respond to a First Amended
17 Complaint and participate in mediation, the parties stipulate to and hereby respectfully
18 request that the Court extend the initial mediation deadline from March 31, 2020 to
19 June 30 2020.

20 IT IS SO STIPULATED.

21 Dated: January 30, 2020

DERBY, McGUINNESS & GOLDSMITH, LLP

23
24 /s/ Anthony Goldsmith
By: Anthony Goldsmith, Esq.
Attorneys for Plaintiff
CRISTINA MENDOZA

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28 ///

1 Dated: January 30, 2020

ROPERS, MAJESKI, KOHN & BENTLEY

2 /s/ David M. McLaughlin

3 By: David M. McLaughlin, Esq.
4 HUDSON SKYPORT PLAZA, LLC, a Delaware
5 limited liability company, HUDSON SKYPORT
6 PLAZA LAND, LLC, a Delaware limited liability
7 company, HUDSON PACIFIC PROPERTIES, INC.,
8 a Maryland corporation
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1 **~~PROPOSED~~ ORDER**

2 For GOOD CAUSE shown and for the reasons set forth above, the below deadlines are
3 amended as follows:

4 Last day to Amend Pleadings: March 2, 2020; and

5 Last day for the Parties to complete Initial Mediation: June 30, 2020;

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7 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

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9
10 Dated: January 31, 2020



11 Hon. Susan van Kuelen
12 UNITED STATES ~~DISTRICT~~/MAGISTRATE JUDGE

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16 **FILER'S ATTESTATION**

17 Pursuant to Civil Local Rule 5-1, I hereby attest I, Anthony Goldsmith, attorney with
18 Derby, McGuinness & Goldsmith, LLP, received the concurrences of Counsel in the filing of this
19 document.
20

21 /s/ Anthony Goldsmith
22 Anthony Goldsmith